



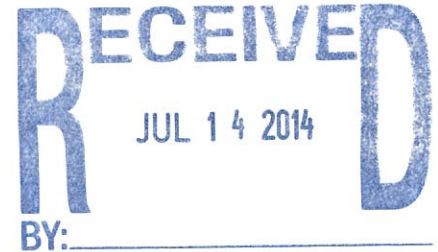
VALLEY REALTY

COLDWELL BANKER COMMERCIAL
VALLEY REALTY
42402 TENTH STREET W, STE "E"
LANCASTER, CA 93534

BUS (661) 948-2644
FAX (661) 945-2524

July 11, 2014

Carl Nadela
Regional Planner
Los Angeles County
Department of Regional Planning
320 West Temple Street, Room 1356
Los Angeles, CA 90012



RE: Issues for Inclusion in the AVAP Environmental Impact Report

Dear Mr. Nadela:

As a lifetime resident of the Antelope Valley and a Commercial Real Estate Agent active in the sale of vacant land in our region, I request that my concerns expressed in this letter be included in the scope of the Environmental Impact Report (EIR) for the Antelope Valley Area General Plan Update (AVAP).

Economic Opportunity Areas:

There are three Economic Opportunity Areas (EOAs) identified in the AVAP that are located around major transit corridors that provide opportunities for growth and economic development in the vicinity of these projects. Within these EOA's, the AVAP designates areas of varying densities for residential development along with commercial and industrial designations. These designations will become zoning upon approval of the plan yet DRP staff has indicated that further studies and a more detailed planning effort will need to be done for any development within each EOA by way of a Community Plan.

Why is a plan being developed that must be amended in order to implement it? How can an EIR accurately analyze the impact of this plan if it must be amended before it can be implemented? The EOAs should be considered as presented in the plan and any requirement for further approval through a Community plan is redundant, counterproductive and unnecessary.

Proposed Significant Ecological Areas (SEA's):

The Antelope Valley Area Plan has included the proposed SEA Ordinance and a significant expansion of over 250,000 acres of SEA designated property in its Land Use Plan. This ordinance has not been approved by the Regional Planning Commission and is still being vetted through public comment. The AVAP should only analyze adopted ordinances and its



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EIR should not have to study un-adopted ordinance. With the November deadline given by the BOS, the AVAP EIR should not exhaust DRP's consultant's time with the examination of ordinance that may not even be adopted in the future.

Therefore, we ask that the AVAP EIR include an analysis of the approved SEA ordinance only. The proposed expansion should be studied only in the Project Alternatives and not the Project as proposed. In that analysis, include detailed scientific, research-based justification for the extent of the proposed designation areas including, but not limited to primary research on the potential impacts on agriculture, biota, geology, hydrology, land use planning, mineral resources, population and housing, delivery of public services, recreation and transportation. Especially because of the extent of the potential degradation of population, housing and other human activity-related environmental activities, justification of the boundaries and the incumbent regulation of that land need a substantial basis to give the lead agency an opportunity to weigh the impacts. Additionally, the EIR must address the balance of the SEA's to environmental justice concerns for the existing and potential future human populations and constituencies that will rely on this valley to provide both habitation and sustenance, therefore the analysis should address the economic impact on individual properties.

Land Use Proscription by Pre-defined Constraint:

The land use patterns, densities and designations shown in the AVAP as proposed for the Project were developed under what has been described as a Hazard, Environmental and Resource Constraints Model (ECM) created by the county. The ECM is described as "a tool to inform stakeholders of potential site constraints and regulations" (General Plan Appendix C, Public Review Draft, 1/2014). However, the "tool to inform" about regulation has become the regulation itself.

The ECM is purported to 'front-load' all the underlying environmental hazards, issues, constraining factors and resources (or lack thereof) that could affect the ability of a particular site to be developed with improvements. However, the model's concept as presented does not provide any quantitative analysis or qualitative set of findings or determinations as to how the constraints identified translate into the development designations and densities imposed let alone the three 'classes' identified in the appendix. After a thorough analysis of the ECM itself and the underlying data and assumptions, the EIR should address 'how', 'why' and 'with what data' the links between the ECM and the AVAP land use designations were arrived at. This substantiation is critical to all the land use, population, housing and environmental justice analysis throughout the EIR and will also inform many portions of the other areas of review and analysis.



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Use of all the most recent information and studies:

The AVAP is shaping the Antelope Valley for future generations. The EIR must include with its analysis current and proposed transit projects, including NW 138, High Speed Rail and High Desert Corridor. And population growth associated with Southern California Association of Governments RTP/SCS projections. With these projections included in the AVAP EIR, it will give a unified planning effort that will allow the community's future housing and jobs to be pro-active and bring economic growth to that region.

Community Standards Districts:

The EIR of the AVAP will analyze impacts associated with land use changes and zoning changes proposed by the County. The Land Use portion proposes to down-zone much of the land within currently adopted and proposed Community Standards Districts. The AVAP EIR should address these changes and provide research-based substantiation for those changes. The activities that have led to the existing and the proposed Community Standards Districts have been vetted by the various communities and any changes via the AVAP to the underlying densities and land use designations have the potential for substantial alterations to housing, population and other human activity-related environmental activities. No environmental analysis will be considered complete unless the existing district land use patterns are included in all project alternatives, including the No Project Alternative.

Rural town centers/Rural Town Areas vs. Rural preservation areas:

The AVAP has created hardline boundaries for existing activity nodes without providing any substantiation for their existence. While a "town center" concept can help focus a balance between housing and jobs, the manner does not provide for the diversity of housing and population that is always found in rural areas of the country and in the existing land use patterns of the Antelope Valley. The areas identified as Rural Town Centers and Rural Town Areas need to include softer edges that allow for reasonable opportunities for the addition of a more diverse set of housing and commercial activities. The other area identified is the Economic Opportunity Areas whose creation is the provision of new locations for reasonable growth within the rural milieu of the valley. However, the down-zoning of the rural preservation areas, which include all remaining unincorporated areas, has the potential to create substantial environmental impacts across the Antelope Valley. The AVAP EIR must address those potential impacts, including, but not limited to, agriculture, biota, geology, hydrology, land use planning, mineral resources, population and housing, delivery of public services, recreation and transportation. The AVAP Project postulates a near vacancy of a substantial amount of the valley. At least one of the Project Alternatives must address a more open, organic (rather than proscribed) maturity of those open portions of the valley so a more diverse pattern of development closer to the existing pattern may continue. In addition, the rural preservation concept may not be consistent with the adopted or proposed with Community Standards Districts. The EIR should include



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an alternative with the Community Standards Districts zoning. Additionally, the EIR must address the balance of development patterns and development diversity with environmental justice concerns for the existing and potential future human populations and constituencies that will rely on this valley to provide both habitation and sustenance.

Health Concerns:

The RL-10 and RL-20 will allow one unit per 10 or 20 acres. While the AVAP is trying to create larger lots outside of the rural town centers, this could have a negative effect on both air quality and health impacts. Many lower density lots are graded and cleared of vegetation to allow the full use of the property. This can cause a significant increase in wind and borne dust. The AVAP EIR should address how such low density zones will affect the inherent health problems associated with Valley Fever, West, etc. that are directly related to large vacant lots with little or no vegetation or development to break up prevailing winds. Additionally, the EIR must address environmental justice concerns for the existing and potential future human populations and constituencies that will rely on this valley to provide both habitation and sustenance.

School District and Education Issues:

The AVAP EIR must address the potential impacts on the several school districts in the valley (Eastside, Wilsona, Keppel, Gorman, Westside, Acton-Agua Dulce, Antelope Valley Union High School and Antelope Valley College). Each of these sovereign jurisdictions regularly reviews its demographic and growth parameters. The AVAP EIR must address how the activities of the plan effect those plans and policies and, in so far as is possible, provide how there is a conflict or consistency between the AVAP and the work of each district including but not limited to the areas of land use planning (over which the district hold certain levels of sovereignty), population and housing, delivery of public services, recreation and transportation. Additionally, the EIR must address environmental justice concerns for the existing and potential future school and residential populations and constituencies that will rely on this valley to provide both habitation, sustenance and education. Consideration must also be given to the long term impact that any change in land use has on the delivery of educational services. Decreasing rural density has a profound impact on delivery of instruction, length and cost of transportation, limitations on services to students, loss of revenue to school districts and thus reductions in staff. These may be unintended consequences of the proposed EIR.

Regards,

A handwritten signature in black ink, appearing to read 'Jordin Hance'.

Jordin Hance